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Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
Central Division**

In Re:

BEVERLY VALENCIA

Debtors.

Case No. 16-23942

Chapter 13

Judge Kevin R. Anderson

**MOTION TO VACATE DISMISSAL AND REINSTATE CHAPTER 13, RESCHEDULE
CONFIRMATION HEARING, AND REQUEST FOR ATTORNEY FEES AND COSTS
(Objection Deadline: October 3, 2016)**

PLEASE TAKE NOTICE that Debtor, through counsel undersigned, has filed with the United States Bankruptcy Court for the District of Utah, a Motion to Vacate Dismissal Pursuant to Fed.R.Civ.P 60(B) and Bankruptcy Rule 9024 ("Motion").

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must:

(1) on or before **October 3, 2016**, file with the Bankruptcy Court a written

Objection, explaining your position at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before **October 3, 2016**. You must also mail a copy to the undersigned counsel at Vannova Legal, PLLC, 47 West 9000 South #1, Sandy UT 84070.

(2) attend a hearing on **October 17, 2016 at 1:30 PM in Courtroom 376**, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, UT 84111. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion to Vacate Dismissal and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion to Vacate Dismissal without hearing.

DATED: September 16, 2016.

/s/ Matthew K. Broadbent
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **NOTICE AND MOTION TO VACATE DISMISSAL PURSUANT TO FED.R.CIV.P. 60(B) AND BANKRUPTCY RULE 9024** was served by ECF (as noted below), or addressed to the following persons, deposited in the U.S. mail, first class, postage fully pre-paid on August 17, 2016 to the following:

US Trustee

United States Trustee
(By ECF)

Creditors

Attached Mailing Matrix
(By U.S. Mail)

Trustee

Lon A. Jenkins
Chapter 13 Trustee
(By ECF)

/s/ Jenny Leato

Label Matrix for local noticing
1088-2
Case 16-23700
District of Utah
Salt Lake City
Fri Sep 16 18:34:42 MDT 2016

ASPENWOOD APTS
C/O KIRK CULLIMORE
644 E UNION SQUARE
SANDY, UT 84070-3403

America First Credit Union
PO Box 9199
Ogden, UT 84409-0199

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

Bonneville Billing & Collections, Inc.
PO Box 150621
Ogden, UT 84415-0621

Matthew K. Broadbent
Vannova Legal, PLLC
47 West 9000 South #1
Sandy, UT 84070-2043

Callaway Apartments
C/O KIRK CULLIMORE
644 E UNION SQUARE
SANDY, UT 84070-3403

Clear Management Solutions
PO Box 26415
Salt Lake City, UT 84126-0415

Crest Financial, inc.
61 W 13490 S
Draper, UT 84020-7209

Dr Calvins Clinic
3800 3500 S
Salt Lake City, UT 84120-3306

E Partner Net
740 E 1910 S
Provo, UT 84606

Eagle's Landing Apartments
625 Redwood Rd
Salt Lake City, UT 84104-3618

Emergency Physicians Integrated Care
144 S 500 E
Salt Lake City, UT 84102-1907

Express Recovery Services
Po Box 26415
Salt Lake City, UT 84126-0415

Thomas E. Goodwin
Parr Brown Gee & Loveless
101 South 200 East
Suite 700
Salt Lake City, UT 84111-3105

Granger Medical Clinic
3181 W 9000 S
West Jordan, UT 84088-5610

Green Light Auto Solutions
Tito's Auto Sales
4740 S State St
Salt Lake City, UT 84107-3839

HLS of Nevada, LLC
Nevada West Financial
7625 Dean Martin Drive
Las Vegas NV 89139-5974

Iasis/Jordan Valley Hospital
3580 West 9000 South
West Jordan, UT 84088-8899

Intermountain Health Care, Inc.
P.O. Box 27808
Salt Lake City UT 84127-0808

Intermountain Healthcare
PO Box 27808
Salt Lake City, Utah 84127-0808

Lon Jenkins tr
405 South Main Street
Suite 600
Salt Lake City, UT 84111-3408

Jiffy Lube / Lube management Corporation
7430 Creek Rd
Sandy, UT 84093-6158

Johnson Mark LLC
4246 S Riverboat Rd Ste
Salt Lake City, UT 84123-2587

Jordan Valley Medical Center
Camie Snowden
406 W. South Jordan Parkway, Ste. 300
South Jordan, Utah 84095-3956

Ken Garff
4175 W 3500 S
Salt Lake City, UT 84120-3203

KeyBank N.A.
4910 Tiedeman Road
Brooklyn, OH 44144-2338

Link Debt Recovery
9176 S 300 W
Sandy, UT 84070-2668

Money Tree Finance
C/o Security Finance
Spartanburg, SC 29304

Mountain America Credit Union
735 S. State St. 3rd Floor
Salt Lake City, UT 84111-3821

Mountain Land Collections, Inc.
Law Offices of Quinn M Kofford
PO Box 1425
American Fork UT 84003-6425

Mountain Loan Centers, Inc.
Attn: Bankruptcy
PO Box 3000
Anaheim, CA 92803-3000

Mountain Medical Physician Specialist
Dept 340
PO Box 20015
Salt Lake City, UT 84130

N.A.R. Inc.
PO BOX 271014
SALT LAKE CITY, UT 84127-1014

North American Recovery
NAR Inc
PO Box 271014
Salt Lake City, UT 84127-1014

Office Recovery Services
PO Box 45033
Salt Lake City, UT 84145-0033

Outsource Receivables Management
372 24th St Ste 300
Ogden, UT 84401-1438

Pediatric Anesthesiologists, Inc.
100 Mario Capecchi Dr
Salt Lake City, UT 84132-0001

SFC Central Bankruptcy
PO Box 1893
Spartanburg, SC 29304-1893

Solucion Hispana
1321 East 3300 South #19
Salt Lake City, UT 84106-3015

United States Trustee
Ken Garff Bldg.
405 South Main Street
Suite 300
Salt Lake City, UT 84111-3402

University Health Care
127 South 500 East, Ste. 420
Salt Lake City, Utah 84102-1979

University of Utah Healthcare
PO Box 413064
Salt Lake City, UT 84141-3064

Utah Department of Workforce Services
480 27th St
Ogden, UT 84401-4202

Utah State Tax Commission
Attn Bankruptcy Unit
210 North 1950 West
Salt Lake City, UT 84134-9000

Beverly V. Valencia
657 S Redwood Rd #1205
Salt Lake City, UT 84104-3643

Western Anesthesia Associates, LLC
PO Box 3810
Salt Lake City, UT 84110-3810

(p)ZIONS FIRST NATIONAL BANK
LEGAL SERVICES UT ZB11 0877
P O BOX 30709
SALT LAKE CITY UT 84130-0709

Gale K. x3Francis
Office of the Attorney General
160 East 300 South
Fifth Floor
P.O. Box 140874
Salt Lake City, UT 84114-0874

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Zions Bank
PO Box 1507
Salt Lake City, UT 84110-1507

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Jack Tracy

End of Label Matrix	
Mailable recipients	48
Bypassed recipients	4
Total	52